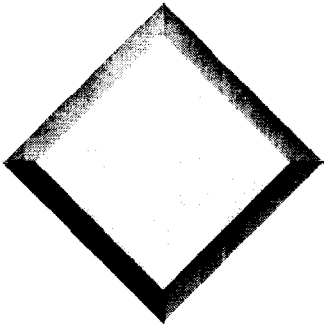


No. of Copies rec'd 0+1
List A B C D E



BRINGING MOBILITY TO THE MASS MARKET

PACIFIC BELL MOBILE SERVICES

CC DOCKET NO. 94-54

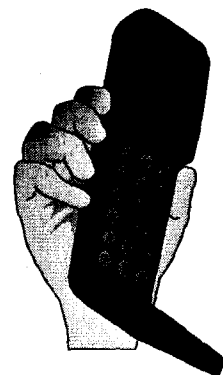
DECEMBER 13, 1994

PACIFIC BELL MOBILE SERVICES

RECEIVED

DEC 14 1994

**FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY**



TOPICS

- ❖ **RESALE AND NUMBER TRANSFERABILITY**
- ❖ **ROAMING**
- ❖ **EQUAL ACCESS**
- ❖ **MUTUAL COMPENSATION**
- ❖ **INTERCONNECTION**

RESALE AND NUMBER TRANSFERABILITY

- ⇒ **CELLULAR HAS A 12 YEAR HEAD START**
- ⇒ **NUMBER TRANSFERABILITY PROMOTES
COMPETITION**
 - ✓ **ALLOWS FASTER MARKET ENTRY**
- ⇒ **EXISTING RESALE RULES REMAIN IN PLACE,
NPRM, CC DOCKET NO. 94-54, PARA 123**
 - ✓ **INCLUDES RIGHT TO NUMBER
TRANSFERABILITY, APPLICATION OF GTE
MOBILNET OF HOUSTON, 1987 FCC LEXIS 3539, PARA 6.
(1987)**
- ⇒ **CELLULARS' MOTIVE IN DENYING IT IS TO
STIFLE NEW COMPETITION**

ROAMING

- ⇒ **COMMISSION NEEDS TO MANDATE RIGHT TO ROAM ONTO ANALOG CELLULAR**
 - ✓ **ROAMING PROVIDES UBIQUITY**
 - ✓ **GOOD FAITH NEGOTIATIONS**
 - ✓ **PROMOTES COMPETITION**
- ⇒ **CELLULAR WILL NOT VOLUNTARILY PROVIDE ROAMING TO NEW ENTRANTS**
- ⇒ **WITHOUT ROAMING, NEW ENTRANTS WILL BE AT A SIGNIFICANT DISADVANTAGE**
- ⇒ **SECTION 201 PROVIDES RIGHT TO ROAM WHICH IS REAFFIRMED IN 6002(C)(1)(B)**



EQUAL ACCESS

- ⇒ THE SAME EQUAL ACCESS REQUIREMENTS SHOULD BE APPLIED TO ALL CMRS PROVIDERS**
- ⇒ PROMOTES REGULATORY SYMMETRY ADOPTED BY CONGRESS AND THE COMMISSION IN CC DOCKET 93-252**
- ⇒ SERVICE AREAS SHOULD BE MTAs**

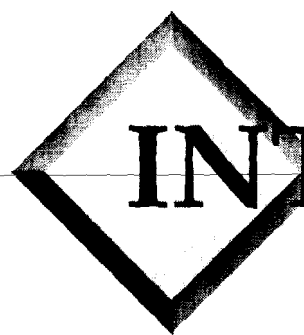
MUTUAL COMPENSATION

⇒ **PRIMARILY A STATE ISSUE**

- ✓ **MOST WIRELESS CALLS ARE INTRASTATE**
- ✓ **COMMISSION HAS NOT PREEMPTED
TERMS AND CONDITIONS OF
INTERCONNECTION ARRANGEMENTS,
SECOND REPORT AND ORDER, DOCKET 93-252, PARA 231,
MARCH 7, 1994**

⇒ **CUSTOMERS' EXPECTATIONS**

- ✓ **WIRELESS IS STILL DISCRETIONARY**
- ✓ **LANDLINE CUSTOMERS WOULD HAVE TO
BE CHARGED**



INTERCONNECTION

- ⇒ **PRESENT SYSTEM--GOOD FAITH
NEGOTIATIONS--IS WORKING**
- ⇒ **CONSISTENT WITH FORBEARANCE ADOPTED
IN CC DOCKET 93-252**